

## UNITED STATES DISTRICT COURT

for the

Southern District of OhioUnited States of America

v.

Case No. 2:22-mj-652

Jaylan Miles Ra Shawn GORE*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 08/17/2022 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

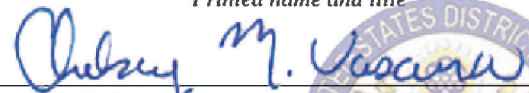
| <i>Code Section</i> | <i>Offense Description</i>                |
|---------------------|---|
| 18 U.S.C. 922(n)    | Receipt of Firearm while under Indictment |

This criminal complaint is based on these facts:  
 See Attachment A

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 9/30/2022City and state: Columbus, Ohio

*Complainant's signature*David A. Mancini, ATF Task Force Officer*Printed name and title*

Chelsey M. Vascara  
 United States Magistrate Judge
*Judge's signature*
Chelsey M. Vascara - United States Magistrate Judge  
*Printed name and title*

## ATTACHMENT A

I, David Mancini, being duly sworn, depose and state that:

I am a Columbus, Ohio Police Department (CPD) Officer assigned as a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a CPD officer for approximately sixteen (16) years. I have been a TFO for approximately one (1) year. As a result of my standing as an ATF Task Force Officer, I am authorized to carry firearms, execute warrants, make arrests for offenses against the United States, and perform other such duties as authorized by law.

1. This affidavit is made in support of a criminal complaint against Jaylan Miles Ra Shawn GORE (DOB: 04/16/2002) for a violation of Title 18, United States Codes, Sections 922(n): Indicted person receives/ ships/ transports firearm knowing they are under indictment. The statements in this affidavit are based upon my training and experience, consultation with Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) Special Agents, Columbus Division of Police (CPD) Detectives / ATF Task Force Officers who are assisting directly in this investigation, review of related police reports, and other sources of information relative to firearms investigations. This affidavit is intended to set forth probable cause in support of the criminal complaint and does not purport to set forth all of my knowledge regarding this investigation.
2. Jaylan Miles Ra Shawn GORE was prohibited from possessing a firearm due to the below listed case.

11/31/2021-Carrying Concealed Weapon, a felony of the 4<sup>th</sup> degree, Franklin County Court of Common Pleas (case number: 22 CR 001452)  
4/6/2022 – Indictment filed  
8/24/2022 – Guilty Plea  
8/24/2022 – Sentenced to 1 year Community Control and placed on Risk Reduction Supervision
3. On August 14<sup>th</sup>, 2022, the Vance's FFL located at 4250 Alum Creek Drive, Obetz, Ohio 43207 was burglarized of 15 firearms. ATF, CPD and Obetz PD initiated an investigation into the burglary. Multiple stolen/ recovered automobiles (KIA and Hyundai) were recovered connected to the FFL burglary.
4. During the course of the investigation a juvenile suspect, hereinafter referred to as NP, was identified. Investigators obtained NP's cellular telephone number from a juvenile cooperator. The cooperator reported contact with NP from and to the previously provided cellular telephone number just days prior. The contact with the juvenile cooperator was audio recorded and a copy of the contact will be maintained by ATF.
5. NP's call detail records and timing advance reports were obtained for the NP's cell data revealed that NP was at the scene of the FFL burglary and also at multiple stolen/ recovered vehicle locations. A copy of historical call detail records and timing advance reports will be maintained by ATF as evidence.

6. On August 17<sup>th</sup>, 2022, a search warrant was executed at the residence of NP. The search warrant resulted in the discovery and seizure of NP's cellular telephone for an additional search warrant.
7. The search warrant of NP's cellular telephone revealed that NP had multiple contacts (call, text, facetime) with Javon GORE (aka: Vonny) and Robert KIMBALL (aka: LoLo), as well as others, both known and unknown to investigators at this time. The search warrant also revealed that NP's cellular telephone was physically at the Vances FFL burglary at the time of the burglary and at multiple locations where stolen/ recovered automobiles were located. A copy of the data obtained from the cellular telephone search warrant will be maintained by ATF as evidence.
8. Additionally, on August 17<sup>th</sup>, 2022, Columbus, Ohio Division of Police officers arrested convicted felon Mikael WATERS (CPD report: 220600728) for possession of a Makarov, P-64, 9mm pistol, sn: BB00605, loaded with six 9mm rounds in the magazine and one 9mm round in the chamber.
9. WATERS is prohibited from possessing firearms for the following convictions;

2020 Having Weapons Under Disability (F-3) conviction from the Franklin County Court of Common Pleas (case # 20CR-1360)  
2/18/2021-Sentenced to 18 months incarceration ODRC  
2015 Robbery (F-2) conviction from the Franklin County Court of Common Pleas (case # 15CR-6135)  
9/16/2016-Sentenced to 4 years incarceration ODRC
10. During an inventory search of WATERS' vehicle CPD officers discovered an additional firearm (Glock, 22, .40 cal pistol, sn: BAVZ760) under the front passenger seat of the vehicle WATERS' was driving. The Glock 22, .40 cal pistol, sn: BAVZ760 was found to have been stolen from the 8/14/2022 Vances FFL burglary. All evidence pertaining to WATERS' arrest will be maintained by ATF as evidence.
11. WATERS cellular telephone was located during the arrest and seized as evidence. A search warrant was executed on WATERS' cellular telephone and a copy of the cellular telephone arrest will be maintained by ATF.
12. WATERS's was slated at the Franklin County, Ohio Jail (FCJ) for the aforementioned weapons violations and investigators monitored and transcribed calls made by WATERS from the Franklin County, Ohio Jail under WATERS' FCJ PIN number: 0388662.
13. On August 17<sup>th</sup>, 2022, at approximately 9:06 a.m., WATERS placed a call to Tonshaya Pipkin, the mother of his child from the FCJ facility. A synopsis of the call is listed below;

8/17/22

9:06 a.m.

614-372-3457-Tonshaya Pipkin

FCO-0N Booking 5

MW--Text Jay and them. Tell them they owe down bro.

TP--Yeah I talked to Dree this week.



MW--Don't give them the car or nothing. That nigga left his shit in the car. This dumb ass left his gun in the car.

TP--Yeah he said that.

MW--Just told him about that. Stop leaving your shit in my car. Told him about that a couple days ago.

MW--I'm sorry for putting your car in there. I woulda been cool if they wouldn't have seen that dumbass bb gun in the back seat. I had an interview at subway tomorrow too. What did bro say?

TP--He was just telling me what happened.

MW--What'd he say about leaving his shit in the car though?

TP--He said he was trying to get it but it was so far up under the seat.

MW--Type shit. When he was with me he was wanting to cry like, that bitch hot and all this and all that. I don't know what the fuck. He shouldn't have left his shit.

MW--I told them there was a nigga on the passenger side. The boys told him to stop and he took off. You know me. I didn't do too much. I said he took off and I never knew. The whole time the police was saying it was just stolen. I was just telling dum dum if you feel like this and you could go fed leave that bitch in the house. Like you know all this about this bitch. He said bro it's not like that just move right.

MW--On hood they was watching us. I said y'all think if I had a glock don't you think that would be on my hip? When y'all pulled up? Fuck all that. Tell bro and them to put in for my bond. Remember a couple days ago when I told you when he left his shit in my car?

TP--Yeah.

MW--We jumped on his ass. He left his phones in there and all types of shit. I'm ready to get a job and be normal for real.

14. As a result of this recorded conversation in which WATERS identified that Jaylon GORE was the individual that had left the Glock pistol under the front seat in his vehicle on August 17<sup>th</sup>, 2022. On September 13<sup>th</sup>, 2022, ATF TFOs Orick and Wright conducted an interview with Jaylan GORE at 369 S. High Street, 4<sup>th</sup> floor, Columbus, Ohio (Franklin County, Ohio Adult Probation Office). Jaylan GORE was read his constitutional rights and agreed to answer questions without an attorney present. The interview was audio recorded and a copy of the interview will be maintained by ATF as evidence.
15. Jaylan GORE was informed that he was being interviewed regarding the Vance's FFL burglary that occurred on 8/14/2022 at 4250 Alum Creek Drive, Obetz, Ohio. Jaylan GORE was further informed that 15 firearms were taken from the location.
16. Jaylan GORE was informed that investigators observed that juvenile suspect NP had contact with Jaylan GORE via cellular telephone (chat, text, facetime, etc). GORE stated he knew NP through his older brother "USH", who has been previously identified as Malachi PEE.
17. Jaylan GORE was informed that immediately following the aforementioned contact Jaylan GORE was observed having contact with Robert KIMBALL (aka: LoLo) and Javon GORE (aka: Vonny). NP's cellular telephone was then observed contacting KIMBALL and Javon GORE. Jaylan GORE was informed that Mikael WATERS (aka: Kels) was arrested on 8/17/2022 with one of the FFL firearms and that Javon GORE was arrested with one of the FFL firearms on 8/18/2022.
18. Jaylan GORE stated KIMBALL informed him, word on the streets, that some people hit a gun store and KIMBALL asked Jaylan GORE if he wanted to look at the stolen firearms via facetime. Jaylan GORE stated he agreed to look at the firearms and described a live video of firearms sitting on a bed. Jaylan GORE stated he identified one of the firearms as a tan FN in addition to the

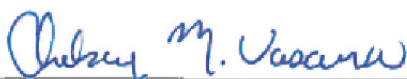
firearm that Javon GORE was arrested with. Jaylan GORE stated KIMBALL asked him if he wanted to purchase any of the stolen firearms. Jaylan GORE stated he informed KIMBALL he did not want to purchase any of the shown firearms.

19. Jaylan GORE was asked if his DNA would be on the Glock 22, .40 cal pistol, sn: BAVZ760 that was located under the front seat of the vehicle WATERS was driving. Jaylan GORE stated, "I touched that Glock. For sure I touched it. I touched the gun but it wasn't mine. I got my own gun. My bitch's gun. I touched it one time. I done looked at it." Jaylan GORE was asked to explain his last statement. Jaylan GORE replied, "Vonny (Javon GORE) and LoLo (Robert KIMBALL) brought it around." Jaylan GORE was asked how the Glock 22, .40 cal pistol ended up in WATERS' vehicle and Jaylan GORE stated Javon GORE and Robert KIMBALL left the firearm in the vehicle.
20. TFO Orick received a verbal Interstate Nexus Determination which was conducted by ATF Special Agent Jason Burns on the aforementioned firearms to determine the origin and status as to travel in interstate and/or foreign commerce. SA Burns is an ATF Interstate Nexus Expert, is a graduate of the ATF Firearms Interstate Nexus Training School, and is certified in making firearms and ammunition interstate nexus determinations. SA Burns determined that the aforementioned firearm, specifically the Glock 22, .40 cal pistol, sn: BAVZ760 was not manufactured in the State of Ohio and therefore moved/affected interstate/foreign commerce to arrive in the State of Ohio.
21. The aforementioned offense occurred in Franklin County, Ohio, in the Southern Judicial District of Ohio.
22. Based upon the aforementioned information and events, and your affiant's training and experience in dealing with Federal firearms violations, your affiant believes that probable cause exists to believe that on or about 8/17/2022, Jaylan Miles Ra Shawn GORE, a prohibited person, did possess a firearm which was not manufactured in the state of Ohio and therefore travelled in and/or affected interstate commerce, in violation of Title 18, United States Codes, Sections 922(n).



David A. Mancini, ATF Task Force Officer

Sworn to before me and signed in my presence.



The Honorable Chelsea M. Vascara  
United States Magistrate Judge  
Southern District of Ohio

9/30/2022  
Date